

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
Southern DIVISION

FILED

JUL 25 2016

[Signature]
CLERK

Charles W. Haan
Citizen of the
United States of America
(Enter the full name of the Plaintiff[s] in this action)

vs.

Dennis M. Daugaard
Governor of the State of
South Dakota

(Enter the full name of ALL Defendant[s] in this action. Fed. R. Civ. P. 10(a) requires that the caption of the complaint include the names of all the parties. Merely listing one party and "et al." is insufficient. Please attach additional sheets if necessary.)

Case No. CIV16-4106
(To be assigned by
Clerk of District Court)

COMPLAINT

- I. State the grounds for filing this case in Federal Court (include federal statutes and/or U.S. Constitution provisions, if you know them. Fed. R. Civ. P. 8(a)(1) requires a short and plain statement of the grounds for the court's jurisdiction.):

The grounds for filing this case in Federal Court are found in: a- United States Declaration of Independence which declares that all men are created equal with certain unalienable Rights- Life, Liberty and the pursuit of Happiness; in: b- SDCL 34-23A-1-2, "Legislative Findings- Termination of life. The Legislature finds that all abortions - - - terminate the life of a whole, separate, unique human being."; and in: c- World Book Encyclopedia, Vol. 16, Copyright 1974, describes, "A human life begins when a sperm (from a male) gets through the outer covering of an egg and fertilizes it." (this occurs in the womb of a female.)

II. Plaintiff, Charles W. Haan resides at

217 17 Street SE
(street address)
Watertown, Codington,
(city) (county)
South Dakota, 57201, 605-882-3657
(state) (zip) (telephone number)

(If more than one plaintiff, provide the same information for each plaintiff below)

III. Defendant, Gov. Dennis M. Daugaard resides at, or its business is located at

500 East Capitol Avenue
(street address)
Pierre, Hughes,
(city) (county)
South Dakota, 57501, 605-773-3212
(state) (zip) (telephone number)

(If more than one defendant, provide the same information for each defendant below)

- IV. Statement of claim (State as briefly as possible the facts of your case. Describe how each defendant is involved. You must state exactly what each defendant personally did, or failed to do, which resulted in harm to you. Include also the names of other persons involved, dates, and places. Be as specific as possible. You may use additional paper if necessary):

From the South Dakota Constitution, Article IV, paragraph 3 - Powers and duties of the Governor, sub-paragraph 1; "The Governor shall be responsible for the faithful execution of the law. He may by appropriate action or proceeding brought in the name of the state, enforce compliance with any constitutional or legislative mandate" The Defendant as the Governor of the State of South Dakota has the responsibility to faithfully enforce and execute all laws.

- V. Relief (State briefly and exactly what you want the Court to do for you.)

The Plaintiff humbly makes a request to the Court to order the ~~Defendant~~ Defendant to issue and enforce a Permanent Injunction to immediately stop all abortions within the State of South Dakota. Abortion as described in SDCL 34-23A-1-2 is defined as murder.

VI. **MONEY DAMAGES:**

A) Do you claim either actual or punitive monetary damages for the acts alleged in this complaint?

YES []

NO ☒

B) If your answer to "A" is YES, state below the amount claimed and the reason[s] you believe you are entitled to recover such monetary damages:

VII. Do you maintain that the wrongs alleged in the complaint are continuing to occur at the present time?

YES ☒

NO []

VIII. Are you requesting a Jury Trial?

YES []

NO ☒

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 25th day of July, 2016

Charles W. Haan

Signature of Plaintiff[s]